UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS) 03 MDL 1570 (RCC) ON SEPTEMBER 11, 2001) ECF CASE

This document also relates to:

Estate of O'Neill, et al. v. The Republic of Iraq, et al., Case No. 04 CV 1076 (RCC) (S.D.N.Y.)

Estate of O'Neill, et al. v. Al Baraka, et al., Case No. 04 CV 1923 (RCC) (S.D.N.Y.)

DEFENDANTS MARTIN WACHTER, ERWIN WACHTER, SERCOR TREUHAND ANSTALT AND ASAT TRUST REG.'S MOTION TO DISMISS

NOW APPEAR Defendants Martin Wachter, Erwin Wachter, Secor Treuhand Anstalt, and Asat Trust Reg., by and through the undersigned counsel, without submitting to the jurisdiction of this

Honorable Court, and move for the dismissal of the claims against them. A memorandum of points and authorities is submitted herewith.

Respectfully submitted,

/s/

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